

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404394112

Receive Date:

Report taken by:

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECOM is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27.

This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers
Address: <u>1099 18TH STREET SUITE 1500</u>		Phone: <u>(970) 304-5000</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Lauren Hoff</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38413 Initial Form 27 Document #: 403987427

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-23512</u>	County Name: <u>WELD</u>
Facility Name: <u>FOSS 6-33</u>	Latitude: <u>40.510070</u>	Longitude: <u>-104.487110</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>6</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>123-25138</u>	County Name: <u>WELD</u>
Facility Name: <u>FOSS 6-35</u>	Latitude: <u>40.511337</u>	Longitude: <u>-104.484180</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESW</u>	Sec: <u>6</u>	Twp: <u>6N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: SPILL OR RELEASE Facility ID: 491772 API #: _____ County Name: WELD
Facility Name: Foss 6-33 (FL02-01) Latitude: 40.508995 Longitude: -104.488284
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: SWSW Sec: 6 Twp: 6N Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use Cropland
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Within Mule Deer Severe Winter Range HPH
Within Pronghorn Winter Concentration Area HPH
Residential 0.25mi NW

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Lab analysis and field screening, if encountered
Yes	SOILS	Refer to tables and figures.	Lab analysis and field screening

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Pursuant to ECMC Rule 911 a site investigation was conducted pertaining to the Foss 06-33 flowline and Foss 06-35 wellhead and flowline. The Foss 06-35 wellhead was cut and capped per ECMC rules on 01/29/2025. Approximately 1514' of the Foss 06-35 flowline was removed on 03/12/2025. Approximately 555' of the Foss 06-33 flowline was removed on 03/12/2025. The ECMC was notified on Form 44, Document #404203088 of the full removal of both flowlines.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

A grab soil sample was collected at the base of the former wellhead excavation, and four soil samples were field screened at the N-E-S-W sidewalls of the wellhead. Soil samples were taken along the flowline at any points of material change/hammer unions, directional changes, as well as at the bell holes on either side of a waterway, and the terminuses at the wellhead and separator. Soil samples collected were analyzed by a certified laboratory for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons) organic compounds in soil per ECMC Table 915-1, and EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

If groundwater is encountered during the site investigation, a grab groundwater sample will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1.

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Visual inspection of the wellhead and flowline areas occurred during decommissioning activities. Field personnel screened all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 8
Number of soil samples exceeding 915-1 8
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 800

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 5.95
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 4

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed _____
Number of groundwater samples exceeding 915-1 _____

Highest concentration of Benzene (µg/l) _____
Highest concentration of Toluene (µg/l) _____
Highest concentration of Ethylbenzene (µg/l) _____
Highest concentration of Xylene (µg/l) _____
Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
 Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

Six (6) background samples were collected during flowline decommissioning at the adjacent Foss 06-34 Flowline (REM # 39225) on 03/10/2025. These background samples were reported under Site Investigation and Remediation Workplan (Doc. # 404217970) which has been "DENIED" due to samples being analyzed out of hold time by the laboratory. Due to the Form 27 being "DENIED" by the ECMC, the analytical results of the six (6) backgrounds samples collected under Foss 06-34 will not be used for comparison to the decommissioning samples.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during the decommissioning will be removed through remedial excavations. Additionally, the pH (FL02R-W) and arsenic (FL02R-W, FL02-01, and FL01-07) exceedances will also be removed during the remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full Table 915-1. Concurrently with the remedial excavation, a Supplemental Site Investigation (SSI) will be conducted to collect background samples (5+) to determine if the pH and arsenic exceedances are attributable to native soil conditions at the site. Background samples will be analyzed for inorganics and metals in soil per ECMC Table 915-1. The proposed sample locations are depicted on the attached figure.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during the decommissioning will be removed through remedial excavations. Additionally, the pH (FL02R-W) and arsenic (FL02R-W, FL02-01, and FL01-07) exceedances will also be removed during the remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full Table 915-1.

REMEDICATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during the decommissioning will be removed through remedial excavations. Additionally, the pH (FL02R-W) and arsenic (FL02R-W, FL02-01, and FL01-07) exceedances will also be removed during the remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full Table 915-1. Concurrently with the remedial excavation, a Supplemental Site Investigation (SSI) will be conducted to collect background samples (5+) to determine if the pH and arsenic exceedances are attributable to native soil conditions at the site. Background samples will be analyzed for inorganics and metals in soil per ECMC Table 915-1. The proposed sample locations are depicted on the attached figure.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ Land Treatment
- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Other _____

Groundwater Remediation Summary

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Groundwater was not encountered during initial decommissioning activities.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other SSI Proposal, SSMR Proposal

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).
If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policies MWZZ316714 and MWZX316724) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: \$ 50000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? No

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 01/29/2025

Proposed date of completion of Reclamation. 06/30/2028

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 11/05/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/29/2025

Proposed site investigation commencement. 03/12/2025

Proposed completion of site investigation. 06/30/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/30/2026

Proposed date of completion of Remediation. 09/30/2026

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The implementation schedule has been changed due to the completion of decommissioning of the Foss 06-33 flowline and Foss 06-35 flowline and wellhead, and the necessity for Supplemental Site Investigation (SSI) activities and remedial excavations adjacent to the wellhead and along the flowline. The work is tentatively scheduled for completion by the end of 2Q 2026.

OPERATOR COMMENT

This Form 27 is being submitted to provide a 4Q 2025 update for the Foss 06-33 flowline and Foss 06-35 flowline and wellhead (REM #38413) and to propose both SSMR and supplemental investigation. The review status of the previously submitted remediation workplan and associated data (Document # 404280586), which summarizes the flowline removal conducted on 03/12/2025, on is currently "In Process" on Web Forms.

The organic exceedances identified at sample locations FL02R-W [naphthalene and benzo(a)anthracene], FL02-01 [naphthalene and benzo(a)anthracene] and FL01-01 [benzo(a)anthracene and benzo(a)pyrene] during the decommissioning will be removed through remedial excavations. Additionally, the pH (FL02R-W) and arsenic (FL02R-W, FL02-01, and FL01-07) exceedances will also be removed during the remedial excavations. The impacted soil will be segregated for proper off-site disposal. The excavations are anticipated to be 10 feet (ft) x 10 ft x 5 ft at FL02R-W and 10 ft x 10 ft x 6 ft at FL02-01 and FL01-07. Remedial excavation confirmation soil samples will be collected from the base and sidewalls and analyzed for full Table 915-1. Concurrently with the remedial excavation, a Supplemental Site Investigation (SSI) will be conducted to collect background samples (5+) to determine if the pH and arsenic exceedances are attributable to native soil conditions at the site. Background samples will be analyzed for inorganics and metals in soil per ECMC Table 915-1.

The Spill ID's for the reportable releases observed at soil sample locations FL02R-W@3' (Form 19 Document # 404281667), and FL01-07@4' (Form 19 Document # 404281330), are pending at the time of this submittal and will be included on a subsequent Form 27.

Pursuant to Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project. The results of the proposed SSI & remedial excavations will be reported within a subsequent Form 27.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Scott Williamson

Title: Environmental Consultant

Submit Date: _____

Email: NorthernColoradoPM@montrose-env.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: _____

Date: _____

Remediation Project Number: 38413

COA Type

Description

0 COA	
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ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num

Name

404396009	SITE INVESTIGATION PLAN
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)